

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

In Re:) Case No: 20-06007
Reonta Reed)
Debtor) Chapter: Chapter 7
) Judge: Timothy A. Barnes

NOTICE OF MOTION

TO: See attached list

PLEASE TAKE NOTICE that on **January 4, 2021 at 1:00 p.m.**, I will appear before the Honorable Timothy A. Barnes, or any judge sitting in that judge's place, and present the **MOTION TO REOPEN BANKRUPTCY TO FILE CERTIFICATION OF COMPLETION OF FINANCIAL MANAGEMENT COURSE AND FOR ENTRY OF A DISCHARGE**, a copy of which is attached.

This motion will be presented and heard electronically using Zoom for Government. No personal appearance in court is necessary or permitted. To appear and be heard on the motion, you must do the following:

To appear by video, use this link: <https://www.zoomgov.com/>. Then enter the meeting ID and password.

To appear by telephone, call Zoom for Government at 1-669-254-5252 or 1-646-828-7666. Then enter the meeting ID and password.

Meeting ID and password. The meeting ID for this hearing is 161 329 5276 and the password is 433658. The meeting ID and password can also be found on the judge's page on the court's website.

If you object to this motion and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without a hearing.

By: /s/ Scott Greenwood
Scott Greenwood
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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

In Re:) **Case No:** **20-06007**
Reonta Reed) **Chapter:** **Chapter 7**
)
Debtor) **Judge:** **Timothy A. Barnes**
)

CERTIFICATE OF SERVICE

The undersigned, Scott Greenwood, an Attorney, does hereby certify that I caused a copy of this notice and attached motion to be mailed to the above persons, at their respective addresses, first-class postage prepaid, by depositing the same in the U.S. Mail at 55 E. Monroe St., Chicago, Illinois, 60603, before 5:30 p.m. on December 8, 2020.

LIST OF PARTIES SERVED

R. Scott Alsterda, Nixon Peabody LLP Three First Natl Plaza #3500, Chicago, IL 60602-4283

Office of the U.S. Trustee, 219 S. Dearborn, Suite 873, Chicago, Illinois 60604

Reonta Ann Reed, 7302 S. Yates Blvd. #2, Chicago, IL 60649

ALL CREDITORS ON THE ATTACHED LIST

Reonta Ann Reed 7302 S Yates Blvd #2 Chicago, IL 60649	Illinois Department of Revenue Bankruptcy Department PO Box 19035 Springfield IL 62794	World Financial Network BANK C/O Portfolio Recov Assoc 150 Corporate Blvd Norfolk VA 23502
Capital One Attn: Bankruptcy Dept. 26525 N Riverwoods Blvd Mettawa IL 60045	Illinois Lending Bankruptcy Dept. 3455 S Ashland Avenue Chicago IL 60608	
Capital ONE AUTO Finan Attn: Bankruptcy Dept. Po Box 259407 Plano TX 75025	Midland Funding, LLC Bankruptcy Department 8875 Aero Drive, # 200 San Diego CA 92123	
Capital ONE BANK USA N.A. C/O Portfolio Recov Assoc 150 Corporate Blvd Norfolk VA 23502	Clerk, First Mun Div 18M1124180 50 W. Washington St., Rm. 1001 Chicago IL 60602	
CBNA Attn: Bankruptcy Dept. 50 Northwest Point Road Elk Grove Village IL 60007	Blitt and Gaines, PC 18M1124180 661 Glenn Ave. Wheeling IL 60090	
City of Chicago - Dept of Revenue Bankruptcy Department 121 N. LaSalle St Room 107 Chicago IL 60602	Navient Attn: Bankruptcy Dept. 123 S Justison St Wilmington DE 19801	
Comcast C/O Convergent Outsourcing 800 Sw 39Th St Renton WA 98057	OPP Loans Attn: Bankruptcy Dept. 130 E Randolph St Ste 34 Chicago IL 60601	
Comenity BANK C/O Portfolio Recov Assoc 150 Corporate Blvd Norfolk VA 23502	Portfolio Recovery Assoc. Riverside Commerce Center 120 Corporate Blvd., Ste. 100 Norfolk VA 23502	
Comenitybank/Ny&Co Attn: Bankruptcy Dept. Po Box 182789 Columbus OH 43218	Clerk, First Mun Div 19M1124556 50 W. Washington St., Rm. 1001 Chicago IL 60602	
Comenitybank/Victoria Attn: Bankruptcy Dept. Po Box 182789 Columbus OH 43218	Blitt and Gaines, PC 19M1124556 661 Glenn Ave. Wheeling IL 60090	
Credit ONE BANK N.A. C/O Midland Funding 320 E Big Beaver Rd Ste Troy MI 48083	Synchrony BANK C/O Portfolio Recov Assoc 150 Corporate Blvd Norfolk VA 23502	
Credit ONE BANK NA Attn: Bankruptcy Dept. Po Box 98875 Las Vegas NV 89193	Synchrony BANK C/O Midland Funding 320 E Big Beaver Rd Ste Troy MI 48083	

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

In Re:) **Case No:** **20-06007**
Reonta Reed) **Chapter:** **Chapter 7**
Debtor,)
) **Judge:** **Timothy A. Barnes**

**MOTION TO REOPEN BANKRUPTCY TO FILE CERTIFICATION OF COMPLETION OF
FINANCIAL MANAGEMENT COURSE AND FOR ENTRY OF A DISCHARGE**

The Debtor, Ms. Reonta Reed (the “Debtor”), by and through her attorneys, Geraci Law LLC, hereby submits this Motion to reopen her case in order to file a certification of completion of an instructional course concerning personal financial management and for entry of a discharge, and in support, alleges as follows:

1. The Debtor filed a Chapter 7 Voluntary Petition on 03/03/2020.
2. The Debtor appeared and testified at the scheduled Section 341 Meeting of Creditors on 04/30/2020 and a no asset report was filed by the Chapter 7 Trustee on the same date.
3. The Debtor’s Chapter 7 case was closed without entry of a discharge 07/06/2020 for failure to file a certification of completion of an instructional course concerning personal financial management (hereinafter “Form 23”) pursuant to 11 U.S.C. Sections 111 and 727, and Rule 1007(b)(7) of the Interim Rules of Bankruptcy Procedure.
4. On 07/07/2020, the Debtor completed an instructional course concerning personal financial management through an approved provider in accordance with 11 U.S.C Sec. 111 and on 07/08/2020 the certificate was filed by the course provider.
5. The Debtor has complied with all other requirements of the Bankruptcy Code and BAPCA.

WHEREFORE, the Debtor respectfully requests that the Court grant their Motion to Reopen their case in order to file Form 23, and for the entry of a discharge pursuant to 11 U.S.C. Sec. 727, and for any other and further relief that the Court deems just and equitable.

Respectfully submitted,

/s/Scott Greenwood
Scott Greenwood

Attorneys for the Debtor

Geraci Law LLC
55 E. Monroe Street #3400
Chicago, Illinois 60603
(Ph): 312.332.1800